DACORUM SITE ALLOCATIONS PLAN

Matter 2 – General Matters

Statement by Vincent and Gorbing on behalf of Taylor Wimpey and Barratt Homes and Fields End Farm LLP/Gardener Family

---

1. This statement is submitted by Martin Friend, Planning Director, of Vincent and Gorbing Planning Associates. Vincent and Gorbing are acting for Taylor Wimpey and Barratt Homes and Fields End Farm LLP/Gardener Family at this Examination. Taylor Wimpey and Barratt Homes are jointly bringing forward the development of the LA3 West Hemel Hempstead Local Allocation. The principle of the removal of the site from the Green Belt and its allocation for residential development is established in the Adopted Core Strategy.

2. As a development of circa 900 units, the LA3 allocation represents a significant component of the Council's housing land supply.

3. We have not requested to appear at the EIP in relation to Matter 2 but submit this statement as a further written representation to clarify our position in respect of the Inspector's questions on the Green Belt, namely questions 11 and 11a. In this regard there is some overlap with our comments in respect of Matter 4 – Housing and Matter 9 – LA3.

   Question 11 : Has the principle of removing land from the Green Belt already been established in the CS ? If so, does the Plan deviate from principles already established ?

   Question 11a : Do the exceptional circumstances, as required by the NPPF paragraph 83, exist to justify the Plan's proposed revision of the boundaries of the Green Belt.

4. The approach to the Green Belt in the Core Strategy, as found sound by the previous Inspector, is embraced in Policy CS5. This confirms the application of national Green Belt policy and indicates that :-

   "There will be no general review of the Green Belt boundary through the Site Allocations DPD, although local allocations (under Policies CS2 and CS3) will be permitted."

5. Policy CS3 confirms the approach to the Local Allocations, that will be *"managed as countryside until needed for development,"* with the footnote to the policy indicating that "countryside" means Green Belt or Rural Area as appropriate.

6. Para. 8.29 of the Core Strategy states that :-

"A strategic review of Green Belt boundaries was not required by the Regional Spatial Strategy (2008). The Council's own review of the Green Belt boundary has identified some locations where releases of land will be necessary to meet specific development needs. No further change will be necessary in the Site Allocations DPD, other than to define these locations precisely and correct any minor anomalies that may still exist."

7. Para. 14.19 of the Core Strategy explains that :-

"Some contribution from greenfield land is planned for within the urban areas and through extensions to some settlements (referred to as local allocations). The development of these local allocations will require changes to the Green Belt boundary."

8. The Core Strategy is therefore very clear as to the extent of Green Belt releases *at this stage* pending the early review and a comprehensive Green Belt review as part of that process. The allocation of land at LA3 is clearly set out in the Core Strategy and the very special circumstances for removing this land from the Green Belt were accepted by the Inspector in finding the Core Strategy sound, with the exact boundaries to be defined though the Allocations Plan process.

9. Clearly, as a daughter document to the Core Strategy, this Site Allocations Plan must be broadly consistent with it and it would be inappropriate at this stage to re-open the debate as to the acceptability of the Green Belt release at LA3 in principle, particularly given the importance of LA3 to the housing trajectory.

10. In respect of this Green Belt release, and indeed the other Local Allocations, we consider that the principle of removing land from the Green Belt has been established and the Plan is entirely in accordance with the Core Strategy in this regard. The exceptional circumstances, as required by the NPPF paragraph 83, clearly exist to justify the Plan's proposed revision of the boundaries of the Green Belt at LA3 in order to meet the housing requirements of the Core Strategy.

11. However, it should not be the role of this Site Allocations Plan to consider further Green Belt releases aside from those already committed in the Core Strategy. A full Green Belt review is underway as part of the evidence base to the emerging Local Plan. To consider this matter through the Site Allocations Plan would clearly delay its progress and entirely undermine the approach of the Council to have an up-to-

date adopted development plan whilst taking forward the review. It would delay the adoption of this DPD, result in short term uncertainty and potentially delay the delivery of the Local Allocations.